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Oak Ridge, TN  
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CITY OF  
OAK RIDGE



OFFICE OF THE MAYOR

POST OFFICE BOX 1 • OAK RIDGE, TENNESSEE 37831-0001

February 21, 2001

Mr. Gary Hartman  
U. S. Department of Energy  
Oak Ridge Operations Office  
EN-912  
P. O. Box 2001  
Oak Ridge, TN 37831

**Draft Site-Wide Environmental Impact Statement for the  
Oak Ridge Y-12 Plant, DOE/EIS-0309 (December 2000)**

Dear Mr. Hartman:

Enclosed is a copy of Resolution No. 2-28-01 as unanimously adopted by the Oak Ridge City Council in regular session on February 19, 2001.

As you will note, this resolution places the Council on record as endorsing the DOE's preferred alternative, *Alternative 4*, as set out in the Draft Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge Y-12 Plant. The resolution also transmits the comments of our Environmental Quality Advisory Board as the official comments of the City of Oak Ridge on the SWEIS.

Please ensure that this resolution and the attached comments are entered into the official record pertaining to the SWEIS for the Oak Ridge Y-12 Plant.

Sincerely,

A handwritten signature in black ink, appearing to read "A. J. Kuhaida, Jr.", is written over a horizontal line.

A. J. Kuhaida, Jr.  
Mayor

jb

Enclosure

1/22 **Comment No. 1**  
Comment noted.

**Issue Code: 22**

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NUMBER 2-28-01

**RESOLUTION**

WHEREAS, the U.S. Department of Energy (DOE) has prepared a Draft Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge Y-12 Plant; and

WHEREAS, the purpose of the SWEIS is to document a baseline for Y-12 operations; and

WHEREAS, the purpose of the SWEIS is also to evaluate alternatives for implementing the programmatic decisions announced by DOE to maintain the national security mission at Y-12 and store surplus enriched uranium; and

WHEREAS, the DOE's preferred alternative, designated *Alternative 4* in the SWEIS, is to construct and operate a new Highly Enriched Uranium Materials Facility and a new Special Materials Complex at Y-12; and

WHEREAS, the DOE is soliciting comments on the SWEIS in accordance with the Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA) of 1969 and DOE NEPA Implementing Procedures; and

WHEREAS, the City of Oak Ridge desires to officially comment to DOE on the SWEIS; and

WHEREAS, the City's Environmental Quality Advisory Board (EQAB) has analyzed the SWEIS, recommending the implementation of *Alternative 4* as beneficial to local economy and as desirable environmentally because it would enhance health and safety aspects of Y-12 operations; and

WHEREAS, the City Manager concurs with the recommendations of the Environmental Quality Advisory Board and recommends transmittal of the attached comments entitled *Comments on Draft Site-Wide Environmental Impact Statement for the Oak Ridge Y-12 Plant, DOE/EIS-0309 (December 2000)*.

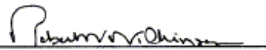
NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCILMEN OF THE CITY OF OAK RIDGE, TENNESSEE:


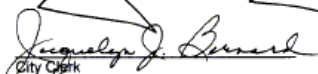
That the recommendation of the City Manager is approved and that the City endorses the DOE's preferred alternative, designated *Alternative 4* in the SWEIS, construction and operation of a new Highly Enriched Uranium Materials Facility and a new Special Materials Complex at Y-12.

BE IT FURTHER RESOLVED, that the attached comments entitled *Comments on Draft Site-Wide Environmental Impact Statement for the Oak Ridge Y-12 Plant, DOE/EIS-0309 (December 2000)* be transmitted to the U.S. Department of Energy as the official comments of the City of Oak Ridge.

This the 19th day of February 2001.

APPROVED AS TO FORM AND LEGALITY:

  
City Attorney

  
Mayor  
  
City Clerk

1/22  
(cont.)

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Comments on the Department of Energy's Draft Site-Wide Environmental Impact Statement for the Oak Ridge Y-12 Plant, DOE/EIS-0309 (December 2000)

Comments about Document Format and Presentation

1. We appreciate the fact that this draft EIS was made available on the Internet, and hope that the same will be done with future DOE documents that are issued for public review. Unfortunately, some of the large PDF files included in this document were difficult or impossible for private individuals to download using commonly available Internet connections, but as a general rule electronic publication on the Internet facilitates public review.
2. The box on page S-1 is a commendable feature. It describes name changes and contractor changes that occurred shortly before the EIS was published, and explains that "because these changes do not affect analyses ... required revisions will be made in the final version." This was a simple and effective way of avoiding costs and delays that would have resulted if it had been necessary to make these changes (such as changing "Y-12 Plant" to "Y-12 National Security Site") throughout the document.
3. The names of all of the alternatives seem to begin with the phrase "No Action," which makes the document unnecessarily confusing. Also, this is not accurate: the alternatives that include new facilities would not be "no action plus the new facility" because some aspects of baseline operations would cease after the new facilities opened. Please use names that make it easier for readers to tell the alternatives apart and that do not imply that new facility operations would be in addition to baseline operations. For example, could "No Action - Planning Basis Operations Plus Construct and Operate New Special Materials Complex" be referred to as something like "New Special Materials Complex Alternative"?
4. The use of acronyms in the document seems excessive.
5. The location of the PIDAS (Perimeter Intrusion Detection and Assessment System) -- and the potential need to extend it around additional areas -- are discussed several times in the document as important determinants of costs and impacts of different alternatives for new facilities. However, the PIDAS is not shown on maps included in the EIS, although its location can be inferred. It is awkward to discuss this feature without providing a map of its current location. If the location can be published, the final EIS should do so. If the location cannot be disclosed for security reasons, the final EIS should acknowledge this (in those passages that discuss the possible need to relocate the PIDAS to accommodate different siting options).

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Comment No. 2

Issue Code: 25

The Final SWEIS will also be available electronically on the Oak Ridge Operations ([www.oro.doe.gov](http://www.oro.doe.gov)) and DOE NEPA (<http://tis.eh.doe.gov/nepa/docs/docs.htm>) websites. In addition, the SWEIS can be requested by contacting Gary Hartman at (865) 576-0273 or by email ([Y-12EIS@oro.doe.gov](mailto:Y-12EIS@oro.doe.gov)).

2/25

Comment No. 3

Issue Code: 25

Comment noted.

3/25

Comment No. 4

Issue Code: 19

The No Action - Planning Basis Operations Alternative is part of each of the alternatives because it refers to all mission requirement activities at Y-12, in accordance with the Stockpile Stewardship and Management PEIS (see Section 3.2.2). The proposed action for new facilities would not cease existing operations, only transfer those operations and activities to the new facilities. Because of the minimal impacts associated with the HEU Storage and Special Materials operations, the overall impacts from the No Action - Planning Basis Operations activities would increase slightly.

4/19

5/25

6/18

Comment No. 5

Issue Code: 25

Comment noted. The Acronyms and Abbreviations list was created to help readers review the document.

Comment No. 6

Issue Code: 18

For security reasons, the exact location of the PIDAS is not shown for each alternative in the Final SWEIS. However, the general area within the PIDAS is shown in Figure E.4.2-1, Volume II of the SWEIS.

Comment No. 7

Issue Code: 26

The Y-12 EM Program staff was consulted regarding the Y-12 Scrap Metal Yard for modernization projects analyzed in the SWEIS.

Comments about Document Content

General Comments

6. Although this document is called a "site-wide EIS," it focuses on just two potential projects and does not factor in other anticipated actions in the Y-12 area. The actions covered in this EIS are anticipated to be the early phases of an ambitious modernization program for Y-12, including more new facilities and a tentatively planned realignment of Bear Creek Road. The final EIS should discuss and assess the proposed new facilities in concert with anticipated later phases of the Y-12 Modernization Program. It should also discuss the interaction of the proposed facility development with ongoing and planned environmental restoration activities in the Y-12 area, as well as the potential for the proposed actions and other planned actions to allow deactivation of replaced facilities and use of their sites for new purposes. Some specific issues related to this general comment are:
  - One of the candidate sites for new facilities is on an unremediated waste site. Reuse of a brownfield site, such as this one, for a new facility would be commendable. However, it is not clear that the EM program expects to clean this site up in time for it to be used for new facilities discussed in this EIS. If DOE considers this to be a reasonable alternative site, the EIS should discuss the cleanup that would need to be done before the site could be occupied, how DOE would go about making the cleanup happen, and how this would affect the progress of other cleanup initiatives.
  - Future phases of the Y-12 Modernization Program should be identified and assessed as "reasonable foreseeable future actions" that contribute to cumulative environmental impacts.
  - Moving operations into new facilities near the west end of the Y-12 Plant should free up existing facilities (generally closer to the east end) for other uses or for demolition. At some point during modernization, it ought to be possible to "pull back" the PIDAS so that it encompasses a smaller area. These changes should open up some areas for new uses, possibly including public visitation to historic facilities such as the Beta-3 calutron building, which DOE has recognized as one of the eight Signature Facilities of the Manhattan Project and which visiting experts considered very attractive for historic tourism. The EIS should discuss the possibilities for freeing up existing facilities and their sites for other uses, as well as the potential beneficial impacts of increased access to portions of the site.
7. This document discusses the EM (Environmental Management) Waste Facility and the NABIR (Natural and Acceleration Bioremediation Research) Field Research Center as if they are proposed facilities, when in fact work is ongoing at both of them. These should be discussed and considered as part of the "No Action - Status Quo" Alternative, not as proposed facilities.
8. The EIS should discuss how siting of new facilities could affect the functioning of the NABIR Field Research Center. Some of the facility siting options would involve construction activities very close to the NABIR experimental area, which is in the old S-3 Ponds area just west of the Y-12 Plant. Could construction dewatering affect groundwater movement in this research area? Would the expansion of the PIDAS encroach on the NABIR research area?

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Comment No. 7 (cont.)

Issue Code: 26

Section 3.2.3.2 of the SWEIS describes Site B environmental remediation requirements and estimates of the scrap metal and contaminated soil that would be removed to construct at that location. Site B is not the preferred site for the HEU Materials Facility or the Special Materials Complex.

DOE is vitally interested in supporting and expanding reuse of Y-12 facilities. Sections 1.1.3 and 3.3 discuss the Y-12 Modernization Program. While the proposed HEU Materials Facility and the Special Materials Complex have progressed to the conceptual design level, other facilities at Y-12 being considered for modernization are still in the very early planning phase, are not reasonably foreseeable at this time, and are not ripe for decision. Table 3.3-1 provides a summary of the potential new facilities. None of the potential future modification projects is included in the No Action - Planning Basis Operations Alternative. Two modernization projects are included in the action alternatives for the Y-12 HEU Storage Mission and Special Materials Mission as discussed in Section 3.2.2, 3.2.4, and 3.2.5. As new modernization projects are proposed for Y-12, separate NEPA analyses would be conducted.

Other uses for Y-12 facilities are considered when mission activities are moved or other downsizing actions free building space. These other potential uses by DOE are always considered before any facility is declared surplus. This is one of the reasons why vacated buildings do not necessarily go to EM for D&D. Because the location of downsizing activities at Y-12 is within the secure production area of the site, the potential for increased access by the public is not anticipated.

Comment No. 8

Issue Code: 18

The Environmental Management Waste Management Facility and Natural and Accelerated Bioremediation Research (NABIR) Field Research Center are projects proceeding independent of the Defense Programs mission activities at Y-12. Both facilities have undergone

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Page-Specific Comments

Page S-34, paragraphs 1 and 3. This passage should be revised to clearly indicate that the Y-12 Site is entirely within the City of Oak Ridge.

Page S-39, paragraph 1. Also pages 4-95 and 4-96. The discussion of the existing situation in the Scarboro Community (part of the City of Oak Ridge) is misleading and has the potential to needlessly upset local residents. While it is true, as stated here, that this community "has been included in a number of epidemiological health studies," the same could be said of other neighborhoods in the City. The final EIS should be revised to avoid implying that the Scarboro community was the only subject for epidemiological study. Also, modifications are needed in the statements that imply that mercury or uranium exposures in Scarboro exceeded regulatory standards in force at the time of the exposure. Regarding mercury exposure, the EIS could describe the situation as is done in Appendix D (page D-57): "Investigators estimate that one of the groups at greatest potential health risk from Y-12 elemental mercury releases between 1950 and 1982 was children in the Scarboro community." DOE should revise the statement about uranium to say: "Impacts of uranium releases to the air on the community between 1944 and 1995 were analyzed to determine if cancer risks from uranium releases are elevated for this *and other local communities*." Also, should "career screening indexes" be changed to "*cancer screening indexes*?"

10/01

11/14

**Comment No. 8 (cont.)**

**Issue Code: 18**

appropriate CERCLA and NEPA review, respectively. A brief description of these projects can be found in Sections 3.2.2.2 and 3.2.2.6. Since these projects are currently being implemented within the Y-12 study area identified in the Y-12 SWEIS, they are discussed and included under the No Action - Planning Basis Operations Alternative because their impacts are not reflected in the baseline operation impacts under the No Action - Status Quo Alternative.

**Comment No. 9**

**Issue Code: 19**

The Y-12 SWEIS evaluates total impacts resulting from all Y-12 operations and activities within the Y-12 SWEIS study area. DOE believes that the impacts for the overall Y-12 Site mission (No Action - Planning Basis Operations), and the construction and operation of new facilities for the HEU Storage Mission and Special Materials Mission at Y-12 would have no impact on the NABIR activities.

Section 5.5.2 of the Final SWEIS addresses construction dewatering. Dewatering activities are expected to occur during building foundation work only. Appropriate construction techniques would be implemented to minimize seepage of groundwater into excavation sites. Therefore, dewatering is expected to be minimal and short-term. No impact on groundwater (direction or flow rate) in the NABIR project area would be expected from constructing the HEU Materials Facility or the Special Materials Complex. The expansion of the Y-12 PIDAS around a new HEU Materials Facility at Site B (closest to S-3 Parking Lot and NABIR research area) would not encroach on or impact NABIR project activities.

**Comment No. 10**

**Issue Code: 01**

The Summary has been updated to reflect that the Y-12 Site is entirely within the City of Oak Ridge.

**Comment No. 11**

**Issue Code: 14**

The Executive Summary and Section 1.8 in Volume I of the Y-12 SWEIS have been updated to reflect the commentor's suggestions.